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July 31, 2023

Honorable Mae A. D'Agostino, U.S.D.J.
United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 218
Albany, New York 12207

Re: United States v. Xiaoqing Zheng
Case No. 1:19-cr-00156 (MAD)

Dear Judge D'Agostino:

I am in receipt of the motion filed by the government to dismiss the claim to property subject to forfeiture by Hui Jin [*CM/ECF document no. 346*]. I am scheduled to start a 2nd Degree Murder criminal trial on August 28, 2023 in the matter of *People v. Christopher Smith-Wadsworth*, and would therefore request a thirty (30) day extension to September 18, 2023 to respond to said motion on behalf of Hui Jin.

I thank the Court for its consideration.

Very truly yours,

LUIBRAND LAW FIRM, PLLC



By: Kevin A. Luibrand, Esq.

KAL:jlmm

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